

EXHIBIT A

Proposed Order

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Ref. No. __

**ORDER SUSTAINING DEBTORS' ONE HUNDRED FORTY-EIGHTH
(SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN NO LIABILITY
PROOFS OF CLAIM (CUSTOMER CLAIMS)**

Upon the one hundred forty-eighth omnibus objection (the “Objection”)² of FTX Trading Ltd. and its affiliated debtors and debtors-in-possession (collectively, the “Debtors”) for entry of an order (this “Order”) sustaining the Objection and disallowing and expunging in their entirety the No Liability Claims set forth in Schedule 1 and Schedule 2 attached hereto, and this Court having jurisdiction to consider the Objection pursuant to 28 U.S.C. §§ 157 and 1334 and the *Amended Standing Order of Reference* from the United States District Court for the District of Delaware, dated February 29, 2012; and this Court being able to issue a final order consistent with Article III of the United States Constitution; and venue of these Chapter 11 Cases and the Objection in this district being proper pursuant to 28 U.S.C. §§ 1408 and 1409; and this matter being a core proceeding pursuant to 28 U.S.C. § 157(b); and this Court having found that proper and adequate notice of the Objection and the relief requested therein has been provided in accordance with the

¹ The last four digits of FTX Trading Ltd.’s and Alameda Research LLC’s tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 Cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors’ claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson’s Commercial Complex, Friars Hill Road, St. John’s, Antigua and Barbuda.

² Capitalized terms not otherwise defined herein are to be given the meanings ascribed to them in the Objection.

Bankruptcy Rules and the Local Rules, and that, except as otherwise ordered herein, no other or further notice is necessary; and responses (if any) to the Objection having been withdrawn, resolved or overruled on the merits; and a hearing having been held to consider the relief requested in the Objection and upon the record of the hearing and all of the proceedings had before this Court; and this Court having found and determined that the relief set forth in this Order is in the best interests of the Debtors and their estates; and that the legal and factual bases set forth in the Objection establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefor;

IT IS HEREBY ORDERED THAT:

1. The Objection is SUSTAINED as set forth herein.
2. Each No Liability Claim set forth in Schedule 1 and Schedule 2 attached hereto is disallowed and expunged in its entirety.
3. This Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object to or defend on any basis are expressly reserved with respect to any No Liability Claim referenced or identified in the Objection that is not listed on Schedule 1 and Schedule 2 attached hereto.
4. Should one or more of the grounds of objection stated in the Objection be dismissed, the Debtors' right to object on any other grounds that the Debtors discover are preserved.
5. To the extent a response is filed regarding any No Liability Claim, each such No Liability Claim, and the Objection as it pertains to such No Liability Claim, will constitute a separate contested matter as contemplated by Bankruptcy Rule 9014. This Order

will be deemed a separate order with respect to each No Liability Claim. Any stay of this Order pending appeal by any claimants whose claims are subject to this Order shall only apply to the contested matter which involves such claimant and shall not act to stay the applicability and/or finality of this Order with respect to the other contested matters listed in the Objection or this Order.

6. The Debtors are authorized and empowered to execute and deliver such documents, and to take and perform all actions necessary to implement and effectuate the relief granted in this Order.

7. Nothing in this Order or the Objection is intended or shall be construed as a waiver of any of the rights the Debtors may have to enforce rights of setoff against the claimants.

8. Nothing in the Objection or this Order, nor any actions or payments made by the Debtors pursuant to this Order, shall be construed as: (a) an admission as to the amount of, basis for, or validity of any claim against the Debtors under the Bankruptcy Code or other applicable non-bankruptcy law; (b) a waiver of the Debtors' or any other party-in-interest's right to dispute any claim; (c) a promise or requirement to pay any particular claim; (d) an implication or admission that any particular claim is of a type specified or defined in this Order; (e) an admission as to the validity, priority, enforceability, or perfection of any lien on, security interest in, or other encumbrance on property of the Debtors' estates; or (f) a waiver of any claims or causes of action which may exist against any entity under the Bankruptcy Code or any other applicable law.

9. This Order is immediately effective and enforceable, notwithstanding the possible applicability of Bankruptcy Rule 6004(h) or otherwise.

10. This Court shall retain jurisdiction with respect to any matters, claims, rights or disputes arising from or related to the Objection or the implementation of this Order.

Dated: _____
Wilmington, Delaware

The Honorable John T. Dorsey
Chief United States Bankruptcy Judge

SCHEDULE 1

No Liability Claims

FTX Trading Ltd. 22-11068 (JTD)
One Hundred Forty-Eighth Omnibus Claims Objection
Schedule 1 - No Liability Claims

			<u>Asserted Claims</u>	
<u>Claim Number</u>	<u>Name</u>	<u>Debtor</u>	<u>Tickers</u>	<u>Ticker Quantity</u>
97184	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96731	Name on file	FTX Trading Ltd.	POC Other Crypto Assertions: MR. ABED IS A VICTIM OF A PIG BUTCHERING SCAM. WE TRACED HIS STOLEN ASSETS TO YOUR EXCHANGE WHICH WERE DEPOSITED AT ##### (TRANSACTION # ID: #####) USDT	199,900.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97235	Name on file	FTX EU Ltd.	EUR	9,229.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96846	Name on file	FTX Trading Ltd.	POC Other Crypto Assertions: ##### (TRANSACTION # ID: #####; #####) POC Other Crypto Assertions: ##### (TRANSACTION # ID: #####) POC Other Crypto Assertions: ##### (TRANSACTION # ID: #####; #####) POC Other Crypto Assertions: MR. BENMOHAMED IS A VICTIM OF A PIG BUTCHERING SCAM. WE TRACED HIS STOLEN ASSETS TO YOUR EXCHANGE WHICH WERE DEPOSITED AT ##### (TRANSACTION # ID: #####) USDT	1,499,651.6900000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96715	Name on file	FTX Trading Ltd.	USD	103,397.4088633700000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96935	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97262	Name on file	FTX Trading Ltd.	BRZ USDC	0.1871000000000000 1.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96847	Name on file	FTX Trading Ltd.	USDT	270,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97387	Name on file	FTX Trading Ltd.	APE ATLAS BNB BTC DOT ETH SUSHI USD	18,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97396	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96909	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
94288	Name on file	FTX Trading Ltd.	USD	250.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97116	Name on file	FTX Trading Ltd.	USDT	10,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97401	Name on file	FTX Trading Ltd.	USD	65,000.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
96997	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96856	Name on file	FTX Trading Ltd.	BULL USD	1.0000000000000000 110,000.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97114	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97378	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96848	Name on file	FTX Trading Ltd.	POC Other Crypto Assertions: MS. HO IS A VICTIM OF A PIG BUTCHERING SCAM. WE TRACED HER STOLEN ASSETS TO YOUR EXCHANGE WHICH WERE DEPOSITED AT ##### (TRANSACTION # ID: #####) USDT	 500,000.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96971	Name on file	FTX Trading Ltd.	BTC	Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96979	Name on file	FTX Trading Ltd.	BTC ETH LUNC SOL USD USDC USDT	0.0556000000000000 2.7566000000000000 60,000.00000000000000 175.00000000000000 950.00000000000000 139.60000000000000 221.40000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97445	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97093	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97651	Name on file	FTX Trading Ltd.	BTC	1.0000000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96795	Name on file	FTX Trading Ltd.	USD	25,000.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96996	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96710	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96881	Name on file	FTX Trading Ltd.		Undetermined*
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97286	Name on file	FTX Trading Ltd.	ATOM AVAX BTC BULL DOGE ETH LINK USD XRP	560.00000000000000 35.00000000000000 6.30000000000000 13.00000000000000 1,060,000.000000000000 6.00000000000000 1,015.00000000000000 7,000.00000000000000 13.00000000000000
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96713	Name on file	FTX Trading Ltd.		Undetermined*

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

[illegible]

Undetermined*: Indicates claim contains unliquidated and/or undetermined amounts

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97031	Name on file	FTX Trading Ltd.	1INCH	1.029506177576000
			AXS	6.190514452833973
			BTC	0.000000013048600
			DOGE	7.000000000000000
			ETH	7.506700030570240
			ETHW	0.015741333918640
			LUNA2	0.000000019502299
			MATIC	9.989982006892348
			SAND	37,742.158740000000000
			SGD	0.000000012249269
			SOL	3.022112972405158
			TRX	200.997200000000000
			USD	10.306173649272977
			USDC	136,547.720956240000000
			USDT	0.000000017429700

Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

97294	Name on file	FTX Trading Ltd.	Undetermined*
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Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.

SCHEDULE 2

No Liability Claims

FTX Trading Ltd. 22-11068 (JTD)
 One Hundred Forty-Eighth Omnibus Claims Objection
 Schedule 2 - No Liability Claims

Asserted Claims				
Claim Number	Name	Debtor	Tickers	Ticker Quantity
96788	Name on file	FTX Trading Ltd.	BULL	1,500.000000000000000
Other Activity Asserted: 1500 units of Bitcoin - I have lost access to my account, have not received notices and could not validate my initial claim was taken into account				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96857	Name on file	FTX Trading Ltd.		Undetermined*
Other Activity Asserted: 5 - 500 blocks, 67.5 - 675 BTC - The FTX Miner for which I had screen shots or experienced mining full blocks as a solo miner and watching a hacker or bankman fried himself drag the blocks off of my page and they would disappear/pay elsewhere.				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96933	Name on file	FTX Trading Ltd.	USD	725,668.000000000000000
Other Activity Asserted: 367800 - Investment				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
96934	Name on file	West Realm Shires Services Inc.	BULL	10.000000000000000
Other Activity Asserted: 480000 - Invest				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				
97997	Name on file	FTX Trading Ltd.	USD	40,000.000000000000000
			USDT	40,000.000000000000000
Other Activity Asserted: 40000 - USDT				
Reason: The Claimant did not provide proper documentation to support the asserted customer entitlement claim. No liability exists on account of the other activity asserted. Utilizing the information provided within the claim form and following a robust review of the books and records, the Debtors have not identified any liability owing to, or customer entitlement of, the claimant.				